

**UNITED STATES DISTRICT COURT
DISTRICT OF NEW JERSEY**

**IN RE VOLKSWAGEN TIMING CHAIN
PRODUCT LIABILITY LITIGATION**

Civil Action No. 16-2765 (JLL)(JAD)

**PLAINTIFFS' UNOPPOSED
MOTION FOR PRELIMINARY
APPROVAL
OF CLASS ACTION
SETTLEMENT**

Plaintiffs Lloyd Artola, Dawn Stanton Blanchard, Katrina Calihan, Hazma Deib, Umar Ellahie, Angel Esquijarosa, Allison Fleck, William Fleck, Allan Gaudet, Zachariah Gossman, Jason Hosier, Demetrie Hylick, Garrett Johnson, Pamela K. Kane, Hannah LeMoine, Shimelesse Mekbeb, Neel Mody, Karl Molwitz, Anoushirvan Nadiri, Suzanne Noyes, Debra J. Oles, Jeffrey Pipe, Jennifer Piumarta, John Schaffranek, Erika Sensnovis, Robby Smith, Michael Spencer, Dena Stockalper, William R. Swihart, David Zhao, Bartosz Zielezinski, and David Zimand (collectively, "Plaintiffs") respectfully move the Court for an Order:

- 1) granting preliminary approval of the proposed class action Settlement;
- 2) preliminarily certifying, for settlement purposes only, and pursuant to the terms of the Settlement Agreement, the proposed Settlement Class for the purposes of providing notice to the members of the proposed Settlement

Class; approving the form and content of, and directing the distribution of the proposed Class Notice and Claim Form, annexed to the Settlement Agreement as Exhibits 1 and 5;

3) authorizing and directing the Parties to retain Epiq Global as Claims Administrator;

4) appointing Carella, Byrne, Cecchi, Olstein, Brody & Agnello, P.C., Kessler Topaz Meltzer & Check, LLP, and Kantrowitz Goldhamer & Graifman, P.C. as Lead Settlement Class Counsel; and,

5) scheduling a date for the Final Approval Hearing not earlier than one hundred and fifty-five (155) days after Preliminary Approval is granted.

In support thereof, Plaintiffs have contemporaneously filed a Memorandum of Law and the Declaration of James E. Cecchi, with exhibits thereto. Defendants Volkswagen of America, Inc., Volkswagen AG and Audi AG do not oppose Plaintiffs' requested relief contained therein.

For the reasons set forth in the Memorandum of Law, Plaintiffs respectfully request that the Court grant their Unopposed Motion and enter the accompanying [Proposed] Order.

Dated: May 14, 2018

Respectfully submitted

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/s/ James E. Cecchi

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Plaintiffs' Executive Committee

CERTIFICATE OF SERVICE

I hereby certify that on the 14th day of May, 2018, a true and correct copy of the foregoing document was electronically filed with the Clerk of the Court, is available for viewing and downloading from the ECF system, and will be served by operation of the Court's electronic filing system (CM/ECF) upon all counsel of record.

s/ James E. Cecchi
James E. Cecchi